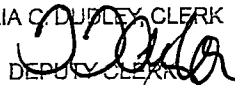


OCT 22 2020

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERK

In the United States District Court
For the Western District of Virginia
Danville

Iyone Young
Petitioner,
vs.

CRIM. Action - No.
4:18-CR-00017-JLK-1

United States of America
Respondent,

Motion to leave to demand
defendants reply brief. Pursant
to 28 U.S.C. § 2255

On October 9, 2020, the Petitioner via mail
its reply brief to the governments response

The Petitioner moves to add an
additional ineffective assistance of counsel
claim to his 2255 motion.

2255 SubSection A - Violation of United States Sentence guidelines.

Claim #4

I the Petitioner would like to add an additional ineffective assistance of counsel claim.

The Petitioner trial counsel was ineffective for failing to object at sentencing to inaccurate information inside my PSR.

Case # C-11-CR: 079370 dated 6/15/11 show inaccurate information. This charge states the Petitioner served 30 days in Custody. This information is incorrect because the Petitioner sentence was suspended in full. No jail time was served.

The Petitioner PSR also states that there were 85 fraudulent straw students. The Petitioner's criminal complaint and indictment only lists 60 straw students. So the PSR reflects an inaccurate number of straw students and an inaccurate total loss amount. The total loss amount reflected in the PSR is a total amount for 85 straw students which is incorrect. The PSR should contain 60 straw students and a total loss amount to reflect only 60 straw students.

Certification of service.

I hereby certify that a true and correct copy of this motion is being sent via mail to the clerk of courts on 10-14-20.

Jeffrey
Reg. # 28808-084

10-14-20.

1990e Navy # 22208-084
Federal Correction Institute

McDowell

P.O. Box 1009

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Clerk of Court

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